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March 21, 2012

KEITH G. VON GLAHN (1952-2007)

## Via ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.

United States District Court

District of New Jersey

Clarkson S. Fisher Federal Bldg. & U.S. Courthouse

402 E. State Street, Room 6 East

Trenton, New Jersey 08608

**Re: *American General Life Ins. Co. v. Ellman Savings Irrevocable Trust, et al.***  
**Civil Action No. 3:08-cv-05364-MLC-TJB**  
**Our File No.: 07478.00537**

Dear Judge Bongiovanni:

As your Honor is aware, this firm represents plaintiff American General Life Insurance Company ("American General") in connection with the above referenced matter. As the Court is aware, defendant The Ellman Savings Irrevocable Trust filed a Motion for Sanctions against American General on March 19, 2012. With the consent of defense counsel, we write to respectfully request that the motion schedule be extended as follows:

- American General's Opposition due on **Monday, April 16;**
- Defendants' Reply due on **Monday, April 30.**

The extension is necessary, in part, because counsel for American General has a trial on April 16 in another matter, preparation for which will consume much of counsel's time during the next several weeks.

We thank the Court for its continued attention to this matter.

Respectfully,

To:  
March 21, 2012  
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WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in cursive script, reading "Karen D. Peck". The signature is written in black ink and is positioned above a horizontal line.

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Karen D. Peck

KDP:kdp

Cc: David BenHaim, Esq. (via ECF)  
Ira Lipsius, Esq. (via ECF)  
Daniel Grossman (via ECF)

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